

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A	§	
BRAZOS LICENSING AND	§	CIVIL ACTION 6:20-cv-00889-ADA
DEVELOPMENT,	§	CIVIL ACTION 6:20-cv-00891-ADA
<i>Plaintiff,</i>	§	CIVIL ACTION 6:20-cv-00892-ADA
	§	CIVIL ACTION 6:20-cv-00893-ADA
	§	CIVIL ACTION 6:20-cv-00916-ADA
v.	§	CIVIL ACTION 6:20-cv-00917-ADA
	§	
	§	
HUAWEI TECHNOLOGIES CO.,	§	
LTD. and HUAWEI	§	
TECHNOLOGIES USA INC.,	§	
<i>Defendants.</i>	§	

MOTION TO ENTER PROPOSED ORDER

TO THE HONORABLE COURT:

Pursuant to the Court’s Standing Order for Discovery Hearings in Patent Cases, WSOU respectfully asks the Court to enter the proposed discovery order attached as Exhibit A, which reflects the Court’s order during the August 4, 2021 hearing. Huawei has declined to join this motion, contending that the Court’s Standing Order for Discovery Hearings does not require it. WSOU is filing this motion in an abundance of caution because the hearing was treated as a discovery hearing, including requiring the parties to submit a joint table. If the Court does not consider the August 4, 2021 hearing to be a “Discovery Hearing,” such that a motion is not required, WSOU nevertheless requests entry of the attached order to memorialize the Court’s August 4, 2021 holdings.

Dated: August 11, 2021

Respectfully submitted,

By: /s/ Ryan Loveless
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Counsel for Plaintiff WSOU Investments, LLC

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served or delivered electronically via U.S. District Court [LIVE]- Document Filing System, to all counsel of record, on August 11, 2021.

/s/ James L. Etheridge
James L. Etheridge

CERTIFICATE OF CONFERENCE

WSOU conferred with Huawei by email on August 10 and 11, 2021. Huawei declined to join this motion.

/s/ James L. Etheridge
James L. Etheridge